

MEMO ENDORSED

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April 29, 2022

Via Electronic Case Filing

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

USDC SDNY
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Re: *Tangle, Inc. v. The Individuals, Corporations, Limited Liability Companies, Partnerships,
and Unincorporated Associations Identified on Schedule A hereto*

Case No: 1:22-cv-02350-VEC

Request for Extension of Time

Dear Judge Caproni:

This firm represents Defendant Shenzhen Baliang Keji Co., LTD (“Defendant”, d/b/a “light-lighting”) in connection with the above referenced matter. Defendant pursuant to FED. R. CIV. P. 6(b)(1), Local Rule 7.1(d) and Your Honor’s Individual Practice 2C, respectfully moves, **with the consent from the Plaintiff**, for an **first time extension** of time up to and including **June 4, 2022** to file an Answer, which is **originally due on May 4, 2022**, and in support states:

Defendant is an entity domiciled in the People’s Republic of China. The undersigned was retained by the Defendant on April 29, 2022. The undersigned has not had time and opportunity to adequately investigate the claims and allegations raised against the Defendant, as well as potentially case-dispositive issues such as lack of personal jurisdiction, and improper service of process. To adequately conduct a defense, it is also likely that all relevant documents will need to be translated from English to Chinese and vice versa, which requires additional time.

We greatly appreciate Your Honor’s time and consideration in this matter, and should the Court need any further information we are available at the Court’s convenience.

Respectfully Submitted,

Cc: Via ECF Counsel of Record

/s/ Ruoting Men

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Application GRANTED. Defendant Shenzhen Baliang Keji Co., LTD's time to answer is hereby ADJOURNED from May 4, 2022 until June 4, 2022.

SO ORDERED.

 5/2/22

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE